

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services	)	
And Speech to Speech Services	)	CG Docket 03-123
For Individuals with Hearing and	)	
Speech Disabilities	)	

**REPLY COMMENTS OF NENA**

The National Emergency Number Association hereby replies to the comments of others in the captioned proceeding. The complexities of this topic and the evolving development of Next Generation E9-1-1 (“NG9-1-1”) requirements and standards underscore the need for a national plan, prior to determining changes and modifications.

NENA strongly concurs with The Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA) recommendation “that a stakeholder summit be convened in the next few months to address 9-1-1 access as a whole.”<sup>1</sup>

Within NENA, there is a considerable amount of related work in progress involving a broad spectrum of entities. This includes revising the IP-capable PSAP features and capabilities standard<sup>2</sup>, to insure that the devices

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<sup>1</sup> Comments, February 22, 2005, 7. See also, Telecommunications for the Deaf, Inc. (“TDF”) ex parte, filed February 23, 2006.

<sup>2</sup> NENA IP Capable PSAP Features and Capabilities Standard, 58-001, <http://www.nena.org/media/files/NENAopsIPenabledPSAPstandard012705.pdf>.

now in popular use and others just being introduced for use by the deaf and hard of hearing communities will be capable of direct access and interaction. Also, the initial requirements for the long-term (i3) standard and related work are being completed. Additional next generation E9-1-1 planning continues in NENA's NG E9-1-1 Program, which is helping insure that full 9-1-1 access is provided, regardless of the type of device being used, video, text and/or voice.<sup>3</sup>

We would urge the FCC to take steps to insure that the deaf and hard of hearing community are strongly encouraged to maintain a TTY for emergency access, until a national plan is developed and solutions are achieved that will allow video phone and text devices to be used for correct and prompt 9-1-1 calling.

RERC-TA comments demonstrate that the deaf and hard-of-hearing community has been quickly migrating to video phones and text devices which provide considerably better day-to-day telecommunications than was available in the past. The comments observe that young people, in particular, are finding less need to maintain a landline connection. They also mention the costly and large TTYs that must be used to communicate via cellular wireless.

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<sup>3</sup> NENA NG E9-1-1 Program details, including its 2005 summary report found at <http://www.nena.org/pages/ContentList.asp?CTID=14>

While comments are divided on whether to require location registration, if such an option is considered, we concur with Communication Services for the Deaf that it must include appropriate Master Street Address Guide (MSAG) validation. We are learning in VoIP and E9-1-1 implementations that the lack of MSAG validation, can have negative results, such as routing to a wrong Public Safety Answering Point (“PSAP”) a considerable distance from the actual call, and/or incorrect location/address delivery which can delay appropriate emergency responses.

Sprint Nextel’s comments include a recommendation for the development of a national database, maintained and administered by a third party. This would be a PSAP database to provide information needed to route/forward a call to the correct PSAP, based on caller’s location. NENA’s NG E9-1-1 Program, as part of its 2006 activities, will be addressing in detail, a national call routing plan at a full day meeting scheduled in mid-April.

The coordination of our work and other similar activities going on in various industry and consumer groups is compatible with, and reinforces the need for, national planning of the kind urged by RERC-TA.

Respectfully submitted,

NENA

By \_\_\_\_\_

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March 8, 2006